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July 6, 2022

**BY ECF**

Hon. Valerie E. Caproni  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**RE: *SingularDTV GmbH v. LeBeau, et al.*, No. 1:21-cv-10130 (VEC)**

Dear Judge Caproni:

We represent Plaintiff SingularDTV GmbH in the above-captioned action and write regarding Defendant Zachary LeBeau's letter dated June 28, 2022 (Dkt. 114) ("Sur-Reply Letter"), which was not authorized by the Court's order (Dkt. 106). In any event, we note that the Sur-Reply Letter fails to address LeBeau's violations of this Court's orders, makes further assertions that contradict LeBeau's sworn testimony about his memorization of the seed phrase (Dkt. 112 at 3-6; Dkt. 114 at 1), and incorrectly suggests as dispositive a supposed method of transfer that the Escrow Agent has neither the authority nor obligation to perform under the Consent Order and the associated escrow agreement (Dkt. 112 at 2-3).

If the Court would find it helpful, Plaintiff is prepared to respond in greater detail to the Sur-Reply Letter.

Respectfully submitted,

/s/ Calvin K. Koo

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